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UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT
12
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.

No. CV 18-8566-AB

**NOTICE OF ERRATA TO THE
REAL PROPERTY LOCATED IN MARICOPA
COUNTY, ARIZONA (PV 1)**

18 \$5,462,027.17 IN BANK FUNDS
SEIZED FROM COMPASS BANK
19 ACCOUNT '3873; AND
\$407,686.14 IN BANK FUNDS
20 SEIZED FROM COMPASS BANK
ACCOUNT '4862,
21

22 Defendants.

23
24 PLEASE TAKE NOTICE of the following errata in the civil
25 forfeiture complaint filed October 5, 2018 (Dkt. No. X):

26 1. Under the Heading ASSETS HELD BY OR FOR THE BENEFIT OF
27 MICHAEL LACEY, paragraph "4.r." was misplaced. That paragraph
28 should have been included in the section headed, "ASSETS HELD BY OR

1 FOR THE BENEFIT OF JAMES LARKIN," which section presently begins at
2 paragraph "4.t.";

3 2. Under the section headed, "MICHAEL LACEY ASSETS," which
4 section presently begins at paragraph 53, sub-paragraph "M" was
5 misplaced. That sub-paragraph should have been included in the
6 section headed, "JAMES LARKIN ASSETS," which section presently
7 begins at paragraph 77; and

8 3. The section headed, "JAMES LARKIN ASSETS," present
9 paragraph 77 contains inaccurate information. Paragraph 74
10 presently reads,

11 Approximately \$11,480,000 million in illicit funds from
12 Backpage's U.S. Bank account '1165 passed-through various
13 Backpage or Backpage Operators accounts, eventually (between
14 March 15 and September 18, 2014) ending up in BMO Harris
15 account '5263, owned or controlled by Lacey. Thereafter, on
16 March 30, 2015, BMO Harris Bank account '5263 transferred
17 \$774,379.46 towards the purchase of the Paradise Valley
18 Property 1.

19 / / /

20 / / /

1 Instead, paragraph 74 should read,

2 Approximately \$41.5 million in illicit funds from
3 Backpage's U.S. Bank account '1165 passed through various
4 Backpage or Backpage Operators accounts. Following these
5 various transfers, eventually, on October 2, 2013, a total
6 of approximately \$26,130.64 was transferred into BMO
7 Harris account '3110, owned or controlled by Larkin.
8 Thereafter, on December 11, 2014, BMO Harris Bank account
9 '3100 paid \$46,957.28 to maintain the Paradise Valley
10 property 1.

11 Dated: October 9, 2018

12 Respectfully submitted,

13
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29 /s/John J. Kucera
30 JOHN J. KUCERA
31 Assistant United States Attorney
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33 Attorneys for Plaintiff
34 UNITED STATES OF AMERICA